

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LITEPANELS, LTD. and VIVENDUM
PRODUCTION SOLUTIONS, INC.

Plaintiffs,

v.

GVM PHOTOGRAPHIC EQUIPMENT, INC.
Defendant.

Civil Action No. 2:24-mc-00053

WRIT OF EXECUTION NOTICE

This paper is a Writ of Execution. It has been issued because there is a judgment against you. It may cause your property to be held or taken to pay the judgment. You may have legal rights to prevent your property from being taken. A lawyer can advise you more specifically of these rights. If you wish to exercise your rights, you must act promptly.

The law provides that certain property cannot be taken. Such property is said to be exempt. There is a debtor's exemption of \$300. There are other exemptions which may be applicable to you. Attached is a summary of some of the major exemptions. You may have other exemptions or rights.

If you have an exemption, you should do the following promptly: (1) Fill out the attached claim form and demand for a prompt hearing. (2) Deliver the form or mail it to the United States Marshal's office at the address noted.

You should come to court ready to explain your exemption. If you do not come to court and prove your exemption, you may lose some of your property.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERENCE SERVICE

ONE READING CENTER

11TH FLOOR

PHILADELPHIA, PA 19107

(215) 238-1701

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PRAECIPE FOR WRIT OF EXECUTION

TO THE CLERK:

ISSUE WRIT OF EXECUTION in the above matter, directed to the United States Marshal for the Eastern District of Pennsylvania, and against Defendant GVM Photographic Equipment, Inc.

Amount Due \$2,757,341.60

Interest from 7/22/24 \$ _____

BERGER LAW GROUP, P.C.

By: Phillip D. Berger
PHILLIP D. BERGER, ESQUIRE
Attorney for Plaintiff

Date: 9/20/24

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WRIT OF EXECUTION

TO THE UNITED STATES MARSHAL FOR THE EASTERN DISTRICT OF
PENNSYLVANIA:

WHEREAS, on September 19, 2024, a judgment was transferred to this Court from the District of New Jersey, which judgment was entered in favor of Plaintiffs Litepanels, LTD. and Vivendum Production Solutions, Inc. (collectively, the "Judgment Creditor") and against GVM Photographic Equipment, Inc. (the "Judgment Debtor") in the amount of \$2,757,341.60, plus post-judgment interest;

AND WHEREAS, the judgment remains unsatisfied;

NOW, THEREFORE, you are hereby commanded to satisfy the said judgment out of the personal property of the Judgment Debtor within the Eastern District of Pennsylvania, and particularly, but not limited to, any and all personal property, inventory, equipment, and other assets belonging to the Judgment Debtor located at its warehouse in Philadelphia, Pennsylvania, including but not limited to:

1. Any and all inventory of photographic equipment and related products;
2. Any office equipment, furniture, and fixtures;
3. Any vehicles or other transportation equipment;
4. Any cash, checks, or other negotiable instruments;
5. Any computers, electronic devices, and data storage devices;
6. Any boxes or other containers (including their contents) that list or state the name GVM;
and
7. Any other personal property of value belonging to the Judgment Debtor.

You are directed to levy upon and seize the above-described property at the Judgment Debtor's warehouse located at:

12285 McNulty Road, Unit 5
Philadelphia, PA 19154

The Judgment Debtor, its officers, agents, and employees are hereby commanded to grant you full access to the premises and to cooperate fully in the identification and seizure of property subject to this Writ of Execution.

FURTHERMORE, IT IS HEREBY ORDERED that the Judgment Debtor, its officers, agents, employees, and any persons acting in concert with them, are **RESTRAINED AND ENJOINED** from selling, transferring, disposing of, removing, or otherwise avoiding the levy and attachment of any personal property identified by the United States Marshal pursuant to this Writ of Execution. All such personal property shall remain at the above-specified warehouse location until such time as it is sold by the United States Marshal or the levy is otherwise satisfied. Any violation of this restraining provision may result in sanctions for contempt of court.

This Writ shall continue in effect until the judgment is satisfied or the Writ is modified or terminated by order of this Court.

Amount Due	\$2,757,341.60
Interest from 7/22/24	\$ _____
(Costs to be added)	\$ _____

CLERK, UNITED STATES DISTRICT COURT

By: _____
Deputy Clerk

Prepared By:
Phillip D. Berger, Esquire
Berger Law Group, PC
919 Conestoga Road
Building 3, Suite 114
Bryn Mawr, PA 19010

LEVY:
Damages \$2,757,341.60
Costs \$
Interest thereon from July 22, 2024
Besides Marshal's Execution Fees

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COUNTY OF DELAWARE

:

COMMONWEALTH OF PENNSYLVANIA

:

AFFIDAVIT IN SUPPORT OF WRIT OF EXECUTION

Phillip D. Berger, Esquire being duly sworn, says:

1. I am the attorney for the judgment creditors, Litepanels, Ltd. and Vivendum Production Solutions, Inc., in the above-captioned matter.
2. On September 19, 2024, a judgment was transferred to this Court from the United States District Court for the District of New Jersey, Civil Action No. 23-3599, in favor of the judgment creditors and against the judgment debtor, GVM Photographic Equipment, Inc., in the amount of \$2,757,341.60, plus post-judgment interest.
3. The judgment remains unsatisfied.
4. Based on information and belief, the judgment debtor owns and possesses personal property subject to execution at its warehouse located at:

**12285 McNulty Road, Unit 5
Philadelphia, PA 19154**

5. The personal property believed to be located at this warehouse includes, but is not limited to:
 - a. Inventory of photographic equipment and related products;
 - b. Office equipment, furniture, and fixtures;
 - c. Vehicles or other transportation equipment;
 - d. Cash, checks, or other negotiable instruments;
 - e. Computers, electronic devices, and data storage devices;
 - f. Any boxes or other containers (including their contents) that list or state the name GVM; and
 - g. Any other personal property of value belonging to the judgment debtor.

6. I make this affidavit in support of the Writ of Execution to be issued in this matter and to provide information to the United States Marshal regarding the location and nature of the property to be levied upon.

BERGER LAW GROUP, P.C.

By:


PHILLIP D. BERGER, ESQUIRE

Subscribed and Sworn before me this

20th day of September, 2024

Sandra L. Trudgeon

Notary of Delaware County

My Commission Expires 6/9/25

Commonwealth of Pennsylvania - Notary Seal
Sandra L. Trudgeon, Notary Public
Delaware County
My commission expires June 9, 2025
Commission number 1168958
Member, Pennsylvania Association of Notaries

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CLAIM FOR EXEMPTION

To the U.S. Marshal:

I, the above named defendant, claim exemption of property from levy or attachment:

(1) From my personal property in my possession which has been levied upon.

(a) I desire that my \$300 statutory exemption be

(i) set aside in kind (specify property to be set aside in kind):

(ii) paid in cash following the sale of the property levied upon; or

(b) I claim the following exemption (specify property and basis of exemption):

(2) From my property which is in the possession of a third party, I claim the following exemptions:

(a) My \$300 statutory exemption: in cash in kind (specify property):

(b) Social security benefits on deposit in the amount of \$ _____

(c) Other (specify amount and basis of exemption): _____

I request a prompt court hearing to determine the exemption. Notice of the hearing should be given to me at _____
(Address) _____ (Telephone Number)

I declare under penalty of perjury that the foregoing statements made in this claim for exemption are true and correct.

Date: _____

(Signature of Defendant)

THIS CLAIM TO BE FILED WITH THE OFFICE OF THE U.S. MARSHAL FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

2110 United States Courthouse
601 Market Street
Philadelphia, PA 19106
(215) 597-7272